

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Robert Holt, et al. v. National Football League, et al. (Plaintiffs Robert Young and Latricia Nicole Evans-Young ONLY)

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS ROBERT YOUNG
AND LATRICIA NICOLE EVANS-
YOUNG**

Charles S. Zimmerman, J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Robert Young and Latricia Nicole Evans-Young only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Robert Young and Latricia Nicole Evans-Young.
2. Plaintiffs' counsel filed a short form complaint for Robert Young and Latricia Nicole Evans-Young on August 20, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Robert Young, Latricia Nicole Evans-Young, and the undersigned.

4. Plaintiffs' counsel properly notified Robert Young and Latricia Nicole Evans-Young of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Robert Young and Latricia Nicole Evans-Young only in Court File No. 2:12-cv-4185-AB.

Dated: February 25, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

Charles S. Zimmerman (#120054)
J. Gordon Rudd, Jr. (#222082)
Brian C. Gudmundson (#336695)
Michael J. Laird (#0398436)
1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 341-0400
Facsimile: (612) 341-0844
Charles.Zimmerman@zimmreed.com
Gordon.Rudd@zimmreed.com
Brian.Gudmundson@zimmreed.com
Michael.Laird@zimmreed.com